

1 Patrick J. Reilly, Esq.
2 Nevada Bar No. 6103
3 Marckia L. Hayes, Esq.
4 Nevada Bar No. 14539
5 BROWNSTEIN HYATT FARBER SCHRECK, LLP
6 100 North City Parkway, Suite 1600
7 Las Vegas, NV 89106-4614
8 Telephone: 702.382.2101
9 Facsimile: 702.382.8135
10 preilly@bhfs.com
11 mhayes@bhfs.com

7 | Attorneys for Nevada Collectors Association

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 NEVADA COLLECTORS
ASSOCIATION, a Nevada non-profit
11 corporation,

12 Plaintiff,

13 | v.

14 STATE OF NEVADA DEPARTMENT
15 OF BUSINESS AND INDUSTRY
16 FINANCIAL INSTITUTIONS DIVISION
17 JUSTICE COURT OF LAS VEGAS
TOWNSHIP; DOE DEFENDANTS 1
through 20; and ROE ENTITY
DEFENDANTS 1 through 20,

18 Defendants.

Case No.: 2:20-cv-0007-JCM-EJY

**STIPULATION AND ORDER
REGARDING REMAINING BRIEFING
ON MOTION FOR PRELIMINARY
INJUNCTION OR, ALTERNATIVELY,
FOR A WRIT OF MANDAMUS OR
PROHIBITION**

(First Request)

STIPULATION

21 Plaintiff Nevada Collectors Association (“NCA”), by and through its counsel of record,
22 Patrick J. Reilly, Esq. and Marckia L. Hayes, Esq., of the law firm of Brownstein Hyatt Farber
23 Schreck, LLP, Defendant Justice Court of Las Vegas Township (“Justice Court”), by and through
24 its counsel of record, Thomas D. Dillard, Jr., Esq., of the law firm Olson, Cannon, Gormley &
25 Stoberski, and Defendant State of Nevada, Department of Business and Industry Financial
26 Institutions Division (“FID”), by and through its counsel of record, Aaron D. Ford, Esq., Nevada
27 Attorney General, and Vivienne Rakowsky, Esq., Deputy Attorney General, hereby stipulate and
28 agree as follows:

1 1. On January 24, 2020, Plaintiff filed its Application for Temporary Restraining
2 Order (the “Application”) (ECF No. 11) and Motion for Preliminary Injunction or, Alternatively,
3 for a Writ of Mandamus or Prohibition (the “Motion”) (ECF No. 12).

4 2. On January 30, 2020, this Court denied the Application, but directed the parties to
5 complete briefing on the Motion. *See* ECF No. 13.

6 3. On February 5, 2020, Defendant Justice Court filed its response to the Motion.
7 ECF No. 17.

8 4. On February 6, 2020, Defendant FID filed its response to the Motion. ECF No.
9 18.

10 5. Plaintiff’s replies are currently due on February 12, 2020, and February 13, 2020,
11 respectively.

12 6. Plaintiff intends to file a combined reply memorandum in response to Defendants’
13 response briefs on February 13, 2020, which effectively entails a one day extension of time to
14 reply to the opposition brief filed by Justice Court. Defendants have agreed to grant such request.

15 7. This stipulation is brought in good faith by all parties and not for purposes of
16 delay. This extension will not result in any undue delay in the administration of this case.

17 8. This is the first requests for extension of time requested by Plaintiff with respect to
18 the replies.

19 ///

20 ///

21 ///

22

23

24

25

26

27

28

1 IT IS THEREFORE STIPULATED by and among the parties that the deadline for
2 Plaintiff to file its replies in support of the Motion is February 13, 2020.

3 DATED this 10th day of February, 2020.

DATED this 10th day of February, 2020.

4 */s/Thomas D. Dillard*
5 THOMAS D. DILLARD, JR. ESQ.
6 Olson Cannon Gormley & Stoberski
7 9950 West Cheyenne Avenue
Las Vegas, NV 89129

/s/Patrick J. Reilly
PATRICK J. REILLY, ESQ.
MARCKIA L. HAYES, ESQ.
Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106

8 *Attorneys for Justice Court of
Las Vegas Township*

*Attorneys for Plaintiff Nevada Collectors
Association*

10 DATED this 10th day of February, 2020.

11 */s/Vivienne Rakowsky*
12 VIVIENNE RAKOWSKY, ESQ.
13 Office of the Attorney General
14 550 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101

15 *Attorneys for State of Nevada, Department of
Business and Industry Financial Institutions
Division*

16 **ORDER**

17 IT IS SO ORDERED.

18
19 *Jeanne C. Mahan*
20 UNITED STATES DISTRICT JUDGE

21 Dated: February 11, 2020